
AFFIDAVIT

STATE OF MISSISSIPPI
COUNTY OF HOLMES

I, Robert Harris, being duly sworn, state under oath as follows:

1. I have personal knowledge of the facts set forth in this affidavit. I am fully capable of giving this affidavit.
2. My name is Robert Harris. I am 49 years old.
3. I am a Black adult resident residing at 307 Fourth Street, Lexington, Mississippi 39095.
4. I am the father to five (5) children.
5. I am a mechanic of 23 years, and I have served my community in multiple capacities.
6. I began experiencing an increase in racially motivated targeting and harassment after Defendant Sam Dobbins was hired as Lexington's Chief of Police in July 2021.
7. On December 31, 2021, officers of the Lexington Police Department came to my residence harassing my family while we are shooting fireworks in honor of the new year.
8. I was aware that the Fireworks Ordinance allowed us to celebrate the holiday, but there was no curfew set by the Mayor and Board of Aldermen for said celebration.
9. I repeatedly asked the officers to leave my residence because my family and I were not in violation of any policies or laws, but they refused and maintained their harassment.
10. Suddenly and without warning, one of the officers dislodged his taser striking my brother, Darius Harris, in the chest resulting in him falling in agony to the ground.
11. In another instance, Lexington Police Department officers ticketed cars in my yard—private property with a “no trespassing” sign—and in the yards of other Black Lexington residents and gave them 24 hours to move them, or they would be towed. Some residents including me lost vehicles to the Lexington Police Department and were without transportation for weeks.

12. In contrast, then-Chief Dobbins reprimanded an officer when that officer ticketed cars at the homes of White Lexington residents.

13. On April 7, 2022, I, along with other residents of Lexington, Mississippi attended a "Know Your Rights" community meeting held by community activists and organizers.

14. I was one of many individuals who decided to speak out about the police brutality and misconduct.

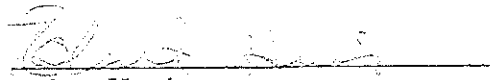
15. The next day, April 8, 2022, I was pulled over and detained by local police. They searched my vehicle and planted marijuana in it.

16. I am not a marijuana user nor distributor.

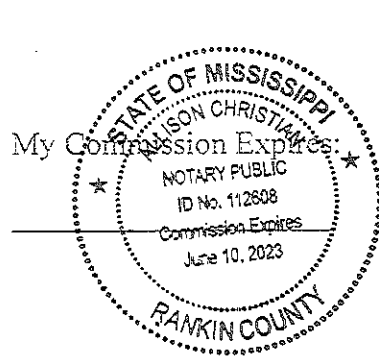
17. I was arrested and immediately charged with possession of marijuana, retaliation against the police, and a host of other charges.


18. This affidavit is executed by affiant herein in accordance with the Mississippi Rules of Civil Procedure.

FURTHER AFFIANT SAYETH NOT.


Robert Harris

Sworn to and subscribed before me this the 15th day of August 2022.




Notary Public